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*Lead Counsel for the Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 4:07-cv-05944-JST

This Document Relates to:  
  
ALL INDIRECT PURCHASER ACTIONS

**DECLARATION OF LAUREN C.  
CAPURRO IN SUPPORT  
PLAINTIFFS' ADMINISTRATIVE  
MOTION PURSUANT TO L.R. 7-11  
FOR LEAVE TO FILE EXCESS  
PAGES**

Judge: Hon. Jon S. Tigar

1 I, Lauren C. Capurro, declare as follows:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice  
3 before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott, LLP and my firm  
4 serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in the above-captioned action. I  
5 submit this declaration in support of IPPs’ Administrative Motion Pursuant to L.R. 7-11 For Leave To  
6 File Excess Pages (“Administrative Motion”) in opposition to Irico Group Corporation and Irico Display  
7 Devices Co., Ltd.’s Motion for Summary Judgment, ECF No. 6225 (the “Motion”). I have personal  
8 knowledge of the facts stated herein, and I could and would competently testify thereto if called as a  
9 witness.

10 2. Irico’s Motion moves for summary judgment on **five** separate grounds. *See* Motion at i  
11 (setting forth five “Issues To Be Decided”). Several of these issues could be a standalone motion, entitled  
12 to a full 25-page opposition. Addressing the complex legal and factual issues raised by each of these five  
13 motions and presenting the evidence necessary to rebut Irico’s contentions in one brief justifies IPPs’  
14 request for additional pages.

15 3. For example, Irico’s motion on international comity grounds raises complex issues  
16 regarding the intersection of U.S. and Chinese laws. In order to rebut Irico’s claims regarding the various  
17 Chinese pricing laws and regulations it relies upon, IPPs need to address Irico’s arguments and present  
18 their own showing supporting their position that summary judgment on international comity grounds is  
19 inappropriate. In addition, the stakes are high for IPPs. Irico’s international comity motion seeks an order  
20 dismissing IPPs’ entire case.

21 4. Irico’s motion on due process grounds seeks summary judgment as to IPPs’ claims under  
22 the state laws of 20 of the 22 States alleged by IPPs. To fulsomely respond and demonstrate that summary  
23 judgment is inappropriate, IPPs are presenting evidence demonstrating the contacts of the 20 States with  
24 the parties and the litigation.

25 5. Irico’s motion for summary judgment on IPPs’ claims based on purchases prior to August  
26 1998 likewise seeks to eliminate the claims of millions of class members and over three years of  
27 damages. IPPs are presenting all relevant evidence relating to Irico’s participation in the conspiracy prior  
28 to August 1998 in response to this Motion in order to demonstrate a genuine issue of material fact.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 1, 2023, in Novato, California.

/s/ Lauren C. Capurro  
Lauren C. Capurro